

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

DEANNA J. ROBINSON

Plaintiff

vs.

HUNT COUNTY, TX, *et al.*

Defendant

§
§
§
§
§
§
§
§
§
§

CIVIL ACTION NO. 3:17-cv-513-K

JOINT REPORT REGARDING SETTLEMENT CONFERENCE

Plaintiff Deanna J. Robinson and Defendant Hunt County, Texas hereby submit the following joint report regarding the parties' settlement conference, pursuant to the Court's scheduling order. [Dkt. 70, ¶ 4].

1. Pursuant to the Court's scheduling order, the parties have exchanged initial settlement offers [See Dkt. 70, ¶4]. Each party has also presented a follow-up offer.

2. The parties through their counsel held a settlement conference by telephone on August 9, 2019. In attendance were JT Morris for Plaintiff and Francisco J. Valenzuela for Defendant.¹

3. During the conference, the parties discussed their respective settlement offers, the timing of resolving the case, whether continued negotiations would be productive, and potential mediation.

4. The parties did not agree to settlement terms during the conference. But the parties agreed that settlement negotiations to date have been productive, and believe that with continued and good-faith negotiations, there is a reasonable possibility of prompt settlement. Both parties agreed during the conference to continue engaging in good-faith efforts toward a prompt

¹ Tom Brandt, counsel for Defendant, intended to participate in the settlement conference, but a hearing in state court took longer than anticipated.

settlement.

5. The parties agreed that negotiations will be more productive and cost-effective than mediation at this time. The parties will comply with the Court's November 15, 2019 mediation deadline, should the case not settle before then.

Dated: August 14, 2019

Respectfully submitted,

/s/ JT Morris

JT Morris
Texas State Bar No. 24094444
JT Morris Law, PLLC
1105 Nueces St., Suite B
Austin, Texas 78132
Telephone: (512) 717-5275
Fax: (512) 582-2948
E-mail: jt@jtmorrislaw.com

David D. Davis
Texas State Bar No. 00790568
Law Offices of David D. Davis, PLLC
P.O. Box 542915
Grand Prairie, Texas 75204
Telephone: (972) 639-3440
Fax: (972) 639-3640
ddd@dddavislaw.net

**ATTORNEYS FOR PLAINTIFF DEANNA J.
ROBINSON**

/s/ Francisco J. Valenzuela (with permission)

THOMAS P. BRANDT
State Bar No. 02883500
tbrandt@fhmbk.com
FRANCISCO J. VALENZUELA
State Bar No. 24056464
fvalenzuela@fhmbk.com
LAURA O'LEARY
State Bar No. 24072262
loleary@fhmbk.com

**FANNING HARPER, MARTINSON,
BRANDT & KUTCHIN, P.C.**

Two Energy Square
4849 Greenville Ave. Suite 1300
Dallas, Texas 75206
(214) 369-1300 (office)
(214) 987-9649 (telecopier)

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing instrument has been delivered to all parties of record, in compliance with the Court's ECF/CM system and/or Rule 5 of the Federal Rules of Civil Procedure, on August 14, 2019.

/s/ JT Morris
JT Morris